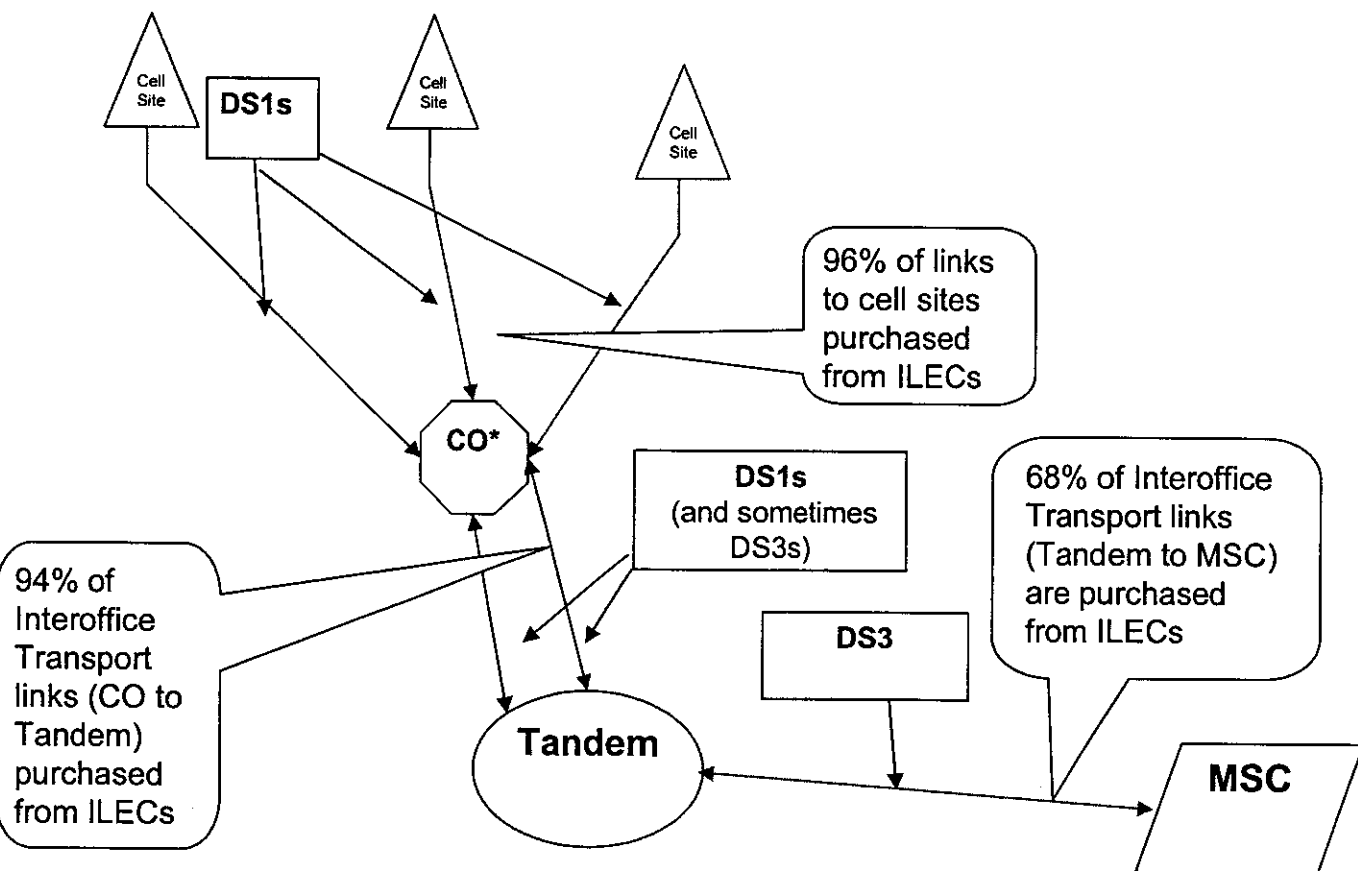


Special Access: Why T-Mobile Cares

Illustrative Network Design



T-Mobile stick together

Special Access: Why T-Mobile Cares

•Key T-Mobile Facts:

- 96% of "cell site to end office" links (special access DS1s) are purchased from incumbent wireline carriers
- 94% of "end office to tandem" links (special access DS1s and DS3s) are purchased from incumbent wireline carriers
- 68% of "tandem to mobile switch" links (special access DS3) are purchased from incumbent wireline carriers

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Special Access: Why T-Mobile Cares

•Key Policy Facts:

- In areas where pricing flexibility has been granted to ILECs, special access prices have gone up, not down
 - Qwest + 62% between 2002 and 2005
 - SWB +27% between 2002 and 2005
 - Pac Bell +15% between 2002 and 2005
- Price-flex markets have DS1 rates that are 20% higher than price-capped markets today
- Special Access prices are usually 25%-200% higher than prices for equivalent cost-based UNEs
- ROI on special access of 37% in 2002, 43% in 2003 , and continues to climb

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Special Access: Why It Matters to NARUC

- NARUC members understand the potential problems posed by the bottleneck control of telecommunications facilities
- Pricing of bottleneck special access facilities impact the cost of providing wireless service, which in turn affects:
 - The price paid by consumers
 - The ability to expand and improve wireless coverage
 - The quality of wireless service
- NARUC members are in a good position to evaluate the actual competition for special access services

T-Mobile stick together

Special Access: What NARUC Can Do

- Be aware of the issues related to competition in special access markets
- Understand that special access issues affect customers in your states, both in terms of price and in terms of quality of service
- Determine how special access competition should be measured
- Investigate whether special access markets are sufficiently competitive to warrant price deregulation
- Discover whether there are special access provisioning issues that affect competitors

T-Mobile **stick together**

What To Remember:

If you smell smoke,
it's a good idea to find out
if there is a fire burning!

T-Mobile **stick together**

Thank you!

T-Mobile **stick together**



ATTACHMENT 2

**COMPARISON OF UNE DS1 TRANSPORT AND SPECIAL ACCESS RATES
FOR QWEST IN COLORADO
Zone 1**

Ex II Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Transport Circuit MRC (Densest Zone)	Flex II DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Transport Circuit NRC (Densest Zone)	Flex II DS1 Transport Circuit NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit NRC (Densest Zone)
Tariff No. 1, on C.1.a; Tariff No. 1, on 2.A	MRC - Tariff F.C.C. No. 1, Section 7.11.4.C.1.a; NRC - Tariff F.C.C. No. 1, Section 21.5.2.A	M-T-M Fixed	\$ 26.76	\$ 92.00	244%	\$ 70.00	162%	\$ 229.34	\$ 313.25	37%	\$ 313.25
		M-T-M Mileage	\$ 1.27	\$ 16.00	1160%	\$ 9.00	609%				
Tariff No. 1, on C.1.b; Tariff No. 1, on 2.A	MRC - Tariff F.C.C. No. 1, Section 7.11.4.C.1.b; NRC - Tariff F.C.C. No. 1, Section 21.5.2.A	1 Yr. Term Fixed		\$ 89.00	233%	\$ 67.90	154%		\$ 313.25	37%	\$ 313.25
		1 Yr. Term Mileage		\$ 15.00	1081%	\$ 8.75	589%				
Tariff No. 1, on C.1.d; Tariff No. 1, on 2.A	MRC - Tariff F.C.C. No. 1, Section 7.11.4.C.1.d; NRC - Tariff F.C.C. No. 1, Section 21.5.2.A	3 Yr. Term Fixed		\$ 85.00	218%	\$ 59.50	122%		\$ 313.25	37%	\$ 313.25
		3 Yr. Term Mileage		\$ 12.00	845%	\$ 7.65	502%				

**COMPARISON OF UNE DS1 TRANSPORT AND SPECIAL ACCESS RATES
FOR VERIZON IN NEW YORK
Zone 1 (UNE and Price Cap) & Band 4 (Flex II)**

Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Transport Circuit MRC (Densest Zone)	Flex II DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Transport Circuit NRC (Densest Zone)	Flex II DS1 Transport Circuit NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit NRC (Densest Zone)
Tariff F.C.C. No. 11, Section 31.7.9.(B) (2)	Tariff F.C.C. No. 11, Section 31.7.9.(B) (2)	M-T-M Fixed	\$ 54.72	\$ 55.00	1%	\$ 47.12	-14%	\$ 205.73	N/A	N/A	N/A
		M-T-M Mileage	\$ 3.05	\$ 27.37	797%	\$ 19.17	529%				
		1 Yr. Term Fixed	Verizon does not offer a 12 month Term Plan					Verizon does not offer a 12 month Term Plan			
		1 Yr. Term Mileage									
Tariff F.C.C. No. 11, Section 31.7.9.(B) (2)	Tariff F.C.C. No. 11, Section 31.7.9.(B) (2)	3 Yr. Term Fixed	\$ 41.25		-25%	\$ 35.34	-35%		N/A	N/A	N/A
		3 Yr. Term Mileage	\$ 20.53		573%	\$ 14.38	371%				

**COMPARISON OF UNE DS1 TRANSPORT AND SPECIAL ACCESS RATES
FOR VERIZON IN PENNSYLVANIA
Zone 1**

Flex II Diff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Transport Circuit MRC (Densest Zone)	Flex II DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Transport Circuit NRC (Densest Zone)	Flex II DS1 Transport Circuit NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit NRC (Densest Zone)
Off F.C.C. Section 5.9.(B) (1)(b)	Tariff F.C.C. No. 1, Section 7.5.9.(B) (1)(b)	M-T-M Fixed	\$ 47.48	\$ 55.00	16%	\$ 46.66	-2%	\$ 8.14	N/A	N/A	N/A
		M-T-M Mileage	\$ 0.60	\$ 27.37	4462%	\$ 19.17	3095%				
		1 Yr. Term Fixed	Verizon does not offer a 12 month Term Plan					Verizon does not offer a 12 month Term Plan			
		1 Yr. Term Mileage									
Off F.C.C. Section 5.16(B)	Tariff F.C.C. No. 1, Section 7.5.9.(B) (1)(b)	3 Yr. Term Fixed		\$ 41.25	-13%	\$ 38.89	-18%		N/A	N/A	N/A
		3 Yr. Term Mileage		20.53	3322%	\$ 14.38	2297%				

**COMPARISON OF UNE DS1 TRANSPORT AND SPECIAL ACCESS RATES
FOR VERIZON IN VIRGINIA
Zone 1 (UNE and Price Cap) & Band 4 (Flex II)**

SA Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Transport Circuit MRC (Densest Zone)	Flex II DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Transport Circuit NRC (Densest Zone)	Flex II DS1 Transport Circuit NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Transport Circuit NRC (Densest Zone)	% Diff (SPA is x% higher than UNE rate)
C Tariff No. Section 7, Section 7.5.9	FCC Tariff No. 1, Section 7, Section 7.5.9 (see comment on Flex II)	M-T-M Fixed	\$41.85	\$55.00	31.42%	\$46.66	11.49%	\$8.14	N/A	N/A	N/A	N/A
		M-T-M Mileage	\$3.02	\$27.37	806.29%	\$19.17	534.77%	N/A	N/A	N/A	N/A	N/A
		1 Yr. Term Fixed		Verizon does not offer a 12 month Term Plan					Verizon does not offer a 12 month Term Plan			
		1 Yr. Term Mileage										
C Tariff No. Section 7, Section 7.5.9	FCC Tariff No. 1, Section 7, Section 7.5.9 (see comment on Flex II)	3 Yr. Term Fixed	\$41.25	-1.43%	\$38.89	-7.07%		N/A	N/A	N/A	N/A	N/A
		3 Yr. Term Mileage	\$20.53	579.80%	\$14.38	376.16%		N/A	N/A	N/A	N/A	N/A

**COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES
FOR AT&T IN TEXAS
Zone 3 - Urban**

Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	
FCC Tariff No. Section 5.2.7 (A)	FCC Tariff No. 73, Section 7.3.10 (F)(1)	M-T-M	\$63.41	\$240.00	278%	\$205.00	223%	\$76.26	\$900.00	1080%	\$900.00	1080%	
C - FCC Tariff No. 73, Section 5.2.7 (1)	MRC - FCC Tariff No. 73, Section 7.3.10 (F)(1)	1 yr term		\$200.00	215%	\$160.00	152%		\$900.00	1080%	\$900.00	1080%	
C - FCC Tariff No. 73, Section 5.2.7 (5)	NRC - FCC Tariff No. 73, Section 7.3.10 (F)(10.4)(1)	3 yr term		\$112.00	77%	\$112.00	77%		\$0.00		\$0.00		Per tariff is w 2,3, Term Plan

COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES
FOR QWEST IN ARIZONA
Zone 1

Flex II Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Comm
C.C. 1, on A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	M-T-M	\$ 67.39	\$ 165.00	145%	\$ 112.30	67%	\$ 169.69	\$ 313.25	85%	\$ 305.00	80%	\$169.6 Basic Install with C Testin
C.C. 1, on A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	1 yr term		\$ 156.00	131%	\$ 108.95	62%		\$ 313.25	85%	\$ 305.00	80%	
C.C. 1, on A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	3 yr term		\$ 130.00	93%	\$ 102.53	52%		\$ 313.25	85%	\$ 305.00	80%	

COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES FOR QWEST IN COLORADO

Zone 1

UNE Rate Cite	SA Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Comments
CO PUC Docket No 577T	Tariff F.C.C. No. 1, Section 17.2.11.A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	M-T-M	\$ 55.27	\$ 165.00	199%	\$ 112.30	103%	\$ 176.82	\$ 313.25	77%	\$ 305.00	72%	\$176.82 - Basic Installation with Coop- with Testing
	Tariff F.C.C. No. 1, Section 17.2.11.A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	1 yr term		\$ 156.00	182%	\$ 108.95	97%		\$ 313.25	77%	\$ 305.00	72%	
	Tariff F.C.C. No. 1, Section 17.2.11.A.1	Tariff F.C.C. No. 1, Section 7.11.4.A.1	3 yr term		\$ 130.00	135%	\$ 102.53	86%		\$ 313.25	77%	\$ 305.00	72%	

**COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES
FOR VERIZON IN NEW YORK
Zone 1 (UNE and Price Cap) & Band 4 (Flex II)**

SA Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)
Tariff F.C.C. No. 11, Section 30.7.9(A)(1)(a)	Tariff FC.C. No. 11, Section 31.7.9(A)(1)(a)	M-T-M	\$ 82.92	\$ 193.99	134%	\$ 177.12	114%	\$ 148.12	\$ 275.00	86%	\$ 275.00	
Tariff F.C.C. No. 11, Section 30.7.9(A)(1)(a)	Tariff FC.C. No. 11, Section 31.7.9(A)(1)(a)	1 yr term	Verizon does not offer a 12 month Term Plan.					Verizon does not offer a 12 month Term Plan.				
Tariff F.C.C. No. 11, Section 30.7.9(A)(1)(a)	Tariff FC.C. No. 11, Section 31.7.9(A)(1)(a)	3 yr term		\$ 145.49	75%	\$ 132.84	60%		\$ 275.00	86%	\$ 275.00	

**COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES
FOR VERIZON IN PENNSYLVANIA
Zone 1**

	SA Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff (SPA is x% higher than UNE rate)
R-3; Pennsylvania Commission on	Tariff F.C.C. No. 1, Section 7.5.9.(A)(1)(a)	Tariff F.C.C. No. 1, Section 7.5.9.(A)(1)(a)	M-T-M	\$ 67.90	\$225.63	232%	\$ 197.00	190%	\$ 25.23	\$ 355.00	1307%	\$ 355.00	
	Tariff F.C.C. No. 1, Section 7.5.9.(A)(1)(a)	Tariff F.C.C. No. 1, Section 7.5.9.(A)(1)(a)	1 yr term	Verizon does not offer a 12 month Term Plan.					Verizon does not offer a 12 month Term Plan.				
	Tariff F.C.C. No. 1, Section 7.5.16(B)	Tariff F.C.C. No. 1, Section 7.5.9.(A)(1)(a)	3 yr term		\$169.22	232%	\$ 147.75	118%		\$ 1.00	-96%	\$ 355.00	

**COMPARISON OF UNE DS1 LOOP AND SPECIAL ACCESS RATES
FOR VERIZON IN VIRGINIA
Zone 1 (UNE and Price Cap) & Band 4 (Flex II)**

SA Flex II Tariff Cite	SA Price Cap Tariff Cite	Pricing Term	UNE DS1 Loop MRC (Densest Zone)	Flex II DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term MRC (Densest Zone)	% Diff MRC (SPA is x% higher than UNE rate)	UNE DS1 Loop NRC (Densest Zone)	Flex II DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)	Price Cap DS1 Ch. Term NRC (Densest Zone)	% Diff NRC (SPA is x% higher than UNE rate)
FCC Tariff No. 1, Section 7, Section 7.5.9	FCC Tariff No. 1, Section 7, Section 7.5.9 (see comment on Flex II)	M-T-M	\$51.13	\$225.63	341.29%	\$197.00	285.29%	\$ 27.19	\$355.00	1205.63%	\$355.00	1205.63%
		1 yr. term	Verizon does not offer a 12 month Term Plan.						Verizon does not offer a 12 month Term Plan.			
FCC Tariff No. 1, Section 7, Section 7.5.9	FCC Tariff No. 1, Section 7, Section 7.5.9 (see comment on Flex II)	3 yr term		\$169.22	230.96%	\$147.75	188.97%		\$1.00	-96.32%	\$1.00	-96.32%



ATTACHMENT 3

AMERITECH

ACCESS SERVICE

19. Managed Value Plan (MVP)19.1 General Description

Managed Value Plan (MVP) is a qualified access discount plan that provides customers with billing discounts for a commitment to maintain a predetermined annual recurring billing amount for five years. MVP is available to any customer with at least ten (10) million dollars in annual billing for the qualified access services listed in 19.2, following. Additional MVP discounts are also available if the Telephone Company fails to meet MVP Service Level Assurance levels stated in 19.3(G), following.

When MVP is ordered, the customer must provide all of the Access Customer Name Abbreviations (ACNA) and Other Company Name (OCN) codes included under the MVP Agreement.

19.2 Services Available Under MVP

MVP billing discounts apply to the recurring revenues for the qualified access services contained in the tariff sections listed in the table below:

Service	General/Basic Description	Rates and Charges	Price Flex Rates and Charges
Entrance Facilities	6.1.3 (A)(1)(a)	6.9.2(A)(1)	21.5.1.2(A)(1)
Direct Transport Service	6.1.3(A)(1)(b)	6.9.6 (A)(2),(3),(5)	21.5.1.2(A)(2)(3)(4)
Direct Analog	7.2.3	7.5.3	21.5.1.2.3
Base Rate, DS1 and DS3 Services	7.2.9	7.5.9	21.5.2.7
Optical Carrier Network (OCN) Point-to-Point Service	7.2.10	7.5.10	21.5.2.7
OC-3, OC-12, OC-48 and OC-192 Dedicated SONET Ring Service	7.2.11	7.5.11	21.5.2.8

(T)

(T)

(D)

(This page filed under Transmittal No. 1357)

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One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

19. Managed Value Plan (MVP) (Cont'd)19.3 MVP Terms and Conditions (Cont'd)(D) Access Service Ratio

As referenced in Section 19.3(B) (3) , preceding, the customer and its affiliates must (T)
 maintain an Access Service Ratio of 95% or Greater. The ratio, calculated monthly, is (T)
 the total qualified access service billed revenue minus the adjusted revenue for the (T)
 associated rate elements not included in the interstate tariff divided by the total (T)
 qualified access service billed revenue. To remain in compliance with the MVP
 agreement, the ratio must be greater than or equal to 95% on the anniversary date of
 the MVP agreement.

The 95% ratio is calculated as follows:

$$\frac{\text{Monthly Access Revenue} - (\text{Monthly Wholesale Revenue} - \text{Fixed Wholesale Revenue})}{\text{Monthly Access Revenue}}$$

Where:

- Monthly Access Revenue is the customer's and its affiliates' current monthly recurring billed revenue, as defined in 19.2, preceding.
- Monthly Wholesale Revenue is the customer's and its affiliates' current monthly recurring billed revenue for associated rate elements not included in the interstate tariff services as defined in 19.3(D), following. (T)
- Fixed Wholesale Revenue is the customer's and its affiliates' monthly recurring billed revenue for associated rate elements not included in the interstate tariff as defined in 19.3(D), following, for the month of August 2000. (T)

(This page filed under Transmittal No. 1305)

ACCESS SERVICE

19. Managed Value Plan (MVP) (Cont'd)19.3 MVP Terms and Conditions (Cont'd)(D) Access Service Ratio (Cont'd)

The customer's and its affiliates' Access Service Ratio must equal or exceed 95% for each month in order for the customer to receive the commitment discount that month. Months where the customer does not receive the commitment discount are subject to true-up as explained in 19.3(H).

The associated rate elements are listed in the table below.

Service	Associated Rate Elements and Information
DS1/LT1	4-wire digital loop DS1 Entrance Facilities DS1 Interoffice Transport DS1 Cross Connects DS1 Multiplexing All DS1 non-tariffed Committed Information Rate Broadband Services
DS3/LT3	DS3 Loop DS3 Entrance Facilities DS3 Interoffice Transport DS3 Cross Connects DS1/DS3 Multiplexing All DS3 non-tariffed Committed Information Rate Broadband Services
OC-3 OC-12 OC-48	OC-3 Entrance Facilities OC-3 Interoffice Transport OC-3 Multiplexing OC-12 Entrance Facility OC-12 Interoffice Transport OC-12 Cross Connects OC-12 Multiplexing OC-48 Entrance Facilities OC-48 Interoffice Transport OC-48 Cross Connects OC-48 Multiplexing All OCN equivalent non-tariffed Committed Information Rate Broadband Service
Other Transport Products	Dark Fiber – Interoffice Dark Fiber – Loop Dark Fiber – Subloop Dark Fiber Cross Connects

As new associated rate elements are introduced and added to the table in Section 19.3 (D) all recurring revenues associated with the new associated rate elements will automatically be added to customer's Monthly Wholesale Revenue, as defined in Section 19.3 (D) preceding for calculation of the Access Service Ratio.

(This page filed under Transmittal No. 1305)